

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Corazon Heras)	Chapter 13
)	Case No. 14 B 45925
Debtor(s))	Judge Timothy A Barnes

Notice of Motion/Certificate of Service

Corazon Heras
200 N Dearborn Unit 3008
Chicago, IL 60601

Debtor Attorney: Sulaiman Law Group Ltd
via Clerk's ECF noticing procedures

On December 17, 2015 at 9:00AM, I will appear at the location listed to the right, and present this motion, a copy which is hereby served upon you.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 744
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, December 11, 2015.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case for Material Default

Comes now Marilyn O. Marshall, Standing Trustee, pursuant to 11 U.S.C. § 1307(c)(6), and respectfully states the following:

1. This is a core proceeding under 28 U.S.C. § 157.
2. Debtor filed for Chapter 13 relief on December 29, 2014.
3. This case was confirmed on April 13, 2015, for a total of 60 months with plan payments of \$165.00.
4. As of the filing of this motion, 12 months have expired since this case was filed.
5. The plan is in material default as it cannot complete at the proposed terms.
6. The balance on this case is approximately \$91,990.35 and at the current rate, the plan will not complete for another 558 months.

WHEREFORE, the Trustee prays that the Court enter an order dismissing this case, and grant any such other relief as it may deem proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE